



SEP 13 1999

C A L I F O R N I A A V O C A D O C O M M I S S I O N

September 10, 1999

Rick Breitenbach
CALFED Bay-Delta Program
1416 Ninth Street, Suite 1155
Sacramento, CA 95814

Re: Comments on Draft Programmatic EIS/EIR

Dear Mr. Breitenbach:

On behalf of California's 6,000 avocado growers and the diverse agricultural interests represented by the Southern California Agricultural Water Team, the California Avocado Commission (the "Commission") is submitting herein comments on the subject Draft Programmatic Environmental Impact Statement/Environmental Impact Report (the "Programmatic EIS/EIR"). The Commission represents the entire California avocado industry on issues of vital concern to its growers, including water supply availability, reliability and cost. The members of the Southern California Agricultural Water Team share the common goal of securing state, regional, and local agricultural water supply and management programs that provide affordable, acceptable quality water for agribusiness use.

Agriculture is an integral part of the coastal southern California economy. The sector generates between \$40 to \$50 billion worth of economic activity annually, when direct, indirect, and induced contributions are calculated. Growers in the region rely heavily on imported water supplies to cultivate their crops. In many instances, water represents up to two-thirds of their operating costs, a dramatic increase from one-third of costs over a period of ten years or less. As a result, water use by coastal southern California agriculture is highly efficient. Growers use best management practices to produce high-value, high-yielding crops, often on land that has no other taxable use. At the same time, water supply reliability has decreased.

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Without reliable and affordable supplies of acceptable quality water, growers in coastal southern California will not remain viable. Rate predictability and stability are particularly important for long-term financing and planting decisions. Good quality imported water reduces water use, enhances opportunities for further water conservation and reuse, and helps preserve the integrity of local groundwater. It is imperative, therefore, that CALFED give consideration to watershed protection and management of water quality such that costly treatment costs are avoided. Historically, these costs have been passed on to agriculture because the area infrastructure primarily consists of combined water systems.

The Programmatic EIS/EIR and revised Phase II Report do not adequately address adding to the total water supply, increased water reliability, and the quality of Bay-Delta water supplies. Instead, CALFED adopts a wait-and-see approach to those areas of greatest concern to coastal southern California agriculture. This leaves growers uncertain about the cost, availability and quality of imported water supplies.

The approach is far from sound business strategy. Growers cannot take such an approach and expect to stay in business, nor should the State and Federal governments gamble with the future of our economy and the environment because of inadequate water supply considerations that ultimately affect most of the State's inhabitants.

CALFED must return to the difficult task and primary mission of coordinating a well-conceived plan that assures delivery of high-quality, reliable water supplies for the people of California. To date, CALFED's emphasis on resolving environmental issues in the Bay-Delta at the expense of addressing water supply and quality issues that are of equal or greater import is off point. Conservation, reallocation, and reduction of available water supplies are solutions that fall short of meeting the needs of the majority of the state's residents. In the end, if we are to prepare for the future, CALFED must get serious about Bay-Delta system and infrastructure enhancements that provide greater water supply capabilities and operational flexibility, higher quality water supplies, and increased reliability against frequent and significant system shortages.

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CALFED must also arrive at the allocation of costs and the financing of solutions in an equitable manner, and not at the expense of any one sector of the regional or state economy. We believe that the Programmatic EIS/EIR and the revised Phase II Report must include full consideration of costs and financing options.

We believe that these are major deficiencies in the Programmatic EIS/EIR that must be addressed before finalizing the document and the Record of Decision. The State's economic well-being, and the future viability of coastal southern California agriculture greatly depends on it.

Sincerely,

A handwritten signature in black ink that reads "Tom Bellamore". The signature is written in a cursive, flowing style.

Tom Bellamore

Senior Vice President